

1 Amanda R. Washton (SB# 227541)
2 *a.washton@conklelaw.com*

3 **CONKLE, KREMER & ENGEL**

4 Professional Law Corporation

5 3130 Wilshire Boulevard, Suite 500

6 Santa Monica, California 90403-2351

7 Phone: (310) 998-9100 • Fax: (310) 998-9109

8 Michael M. Lafeber (*pro hac vice*)

9 *mlafeber@tafilaw.com*

10 O. Joseph Balthazor Jr. (*pro hac vice*)

11 *jbalthazor@tafilaw.com*

12 **TAFT STETTINIUS & HOLLISTER LLP**

13 2200 IDS Center

14 80 S. 8th St.

15 Minneapolis, MN 55402

16 Phone: (612) 977-8400 • Fax: (612) 977-8650

17 Attorneys for Defendant, Counterclaimant, Plaintiff
18 and Third Party Plaintiff Dexon Computer, Inc.

19 UNITED STATES DISTRICT COURT

20 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

21 CISCO SYSTEMS, INC., a Delaware
22 corporation, and CISCO TECHNOLOGY,
23 INC., a California corporation,
24 Plaintiffs and Counterclaim Defendants
25 v.

26 DEXON COMPUTER, INC.,
27 Defendant, Counterclaim Plaintiff and Third
28 Party Plaintiff
v.

ATLANTIX GLOBAL SYSTEMS
INTERNATIONAL, LLC, BIZCOM
ELECTRONICS, INC., DIGI DEVICES
ONLINE, ENTERPRISE BUSINESS
TECHNOLOGIES, INC., FIBER CABLE
CONNECTIONS, MJSI, MULTIMODE
TECHNOLOGIES, LLC, NETWORK
REPUBLIC, OPTIMUM DATA, INC.,
PARAGON, PURE FUTURE
TECHNOLOGY, INC., SEASTAR IT
TRADING LLC, SERVER TECH SUPPLY,
SOFTNETWORKS, INC., STRADA
NETWORKS, LLC, STRATEGIC
TELECOM SUPPLY & SOLUTIONS,
TEKSAVERS, UNLIMITED NETWORK
SOLUTIONS, and WISECOM
TECHNOLOGIES,

Third Party Defendants

Case No. 3:20-cv-4926-CRB

**STIPULATION FOR ORDER
EXTENDING TIME TO AMEND
RESPONSIVE PLEADING AND
RESPOND THERETO; [PROPOSED]
ORDER**

Hon. Charles R. Breyer
Presiding Judge

Date: (Affects filing deadline presently
set for July 8, 2021)

STIPULATION

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure (“FRCP”) and Local Rule 6-1(a) of the Northern District of California Civil Local Rules, Defendant, Counterclaim Plaintiff and Third Party Plaintiff Dexon Computer, Inc. (“Dexon”) and Plaintiffs and Counterclaim Defendants Cisco Systems, Inc. and Cisco Technology, Inc. (“Cisco”) jointly seek an extension of Dexon’s time to file an amended answer, affirmative defenses, counterclaims, and third party claims as a matter of right, and a corresponding stay of Cisco’s time to file a response to Dexon’s original counterclaims against Cisco in light of such planned amendments. The parties hereto agree that this request is reasonable and stipulate to an Order as follows:

1. On June 17, 2021, Dexon filed its answer and affirmative defenses to Cisco’s First Amended Complaint, along with counterclaims and third-party claims (Dkt. 43). Cisco’s response to Dexon’s counterclaims is currently due July 8, 2021.

2. Dexon has advised Cisco that it intends to file an amended: answer, affirmative defenses, counterclaims and third party claims as a matter of right pursuant to F.R.C.P. 15. Such amended responsive pleading will render Dexon’s original responsive pleading and any response by Cisco thereto a nullity.

3. To accommodate the parties’ respective schedules, and in the interest of judicial economy, the Parties agree that the following schedule is reasonable and that good cause exists for this Court to extend the Parties’ respective deadlines as follows:

i) Dexon’s time to file an amended answer, affirmative defenses, counterclaims, and third party claims as a matter of right pursuant to F.R.C.P would be extended to July 29, 2021; and

ii) Cisco’s time to respond to Dexon’s original responsive pleading would be stayed pending Dexon’s filing of its amended answer, affirmative defenses, counterclaim and third party claims. Cisco’s would have 30 days from the filing of such amended pleading to file its response thereto.

1 4. Third Party Defendants have not yet been served and have not yet appeared in this
2 action. The Parties to this stipulation reserve the right to seek additional extensions for good cause.

3 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

4 Dated: July 7, 2021

5
6 By: /s/ Michael M. Lafeber
7 Michael M. Lafeber
8 TAFT STETTINIUS & HOLLISTER LLP
9 Attorneys for Movent Defendant
Dexon Computer, Inc.

10
11 Dated: July 7, 2021

12
13 By: /s/ Louis P. Feuchtbaum
14 Louis P. Feuchtbaum
15 SIDEMAN & BANCROFT, LLP
16 Attorneys for Plaintiffs Cisco Systems, Inc. and
Cisco Technology, Inc.

17 **ATTESTATION**

18 Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest under penalty of
19 perjury that I have obtained consent to file this document from every signatory above.

20
21 Dated: July 7, 2021

CONKLE, KREMER & ENGEL

22
23 By: /s/ Amanda R. Washton
24 Amanda R. Washton
25 Attorneys for Defendant
26 Dexon Computer, Inc.
27
28

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

Charles R. Breyer
United States District Judge